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June 9, 2020

VIA ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States of America v. Martin Ross, et al.
S1 19 Cr. 913 (SHS)

Dear Judge Stein:

We represent Martin Ross in the above-captioned matter. We are writing to inform the Court that Mr. Ross's close family friend, Octavio Figueroa, suddenly passed away on May 28, 2020, and to request an order from the Court to permit Mr. Ross to pay his final respects to his friend.

Mr. Figueroa was one of two men murdered on Amsterdam Avenue the night of May 28th. Though Messrs. Ross and Figueroa were not related by blood, they were incredibly close, sharing a bond going back decades and based on mutual family ties. Indeed, their families celebrated family functions and holiday events together. Mr. Ross instinctively calls Mr. Figueroa his "cousin," and likens the relationship more to an older brother. Mr. Figueroa consistently helped and supported Mr. Ross. He gave Mr. Ross money when he needed it and connected him to employment, such as security jobs, and together they celebrated major life events, like the births of children. The two spoke multiple times a day. Given the sudden nature of Octavio's death, and the pain it has caused his family, Mr. Ross would greatly appreciate the opportunity to pay his final respects with his loved ones.

The family has made the following funeral arrangements:

Caribe Funeral Home
1922 Utica Avenue
Brooklyn, NY 112234
Saturday, June 13th, 2:00 pm- 6:00 pm.

Although the government opposes this request, I understand that arrangements have been made in the past to accommodate similar requests.

In light of the circumstances, I request the Court order that the U.S. Marshal's service make immediate arrangements for Mr. Ross to be picked up from the MCC, brought to the Caribe Funeral Home on Saturday, June 13, 2020, permit Mr. Ross two hours with his family to pay his

final respects, and then be returned to the MCC under such conditions the U.S. Marshal deems necessary.

I want to thank the Court for its consideration of this important matter.

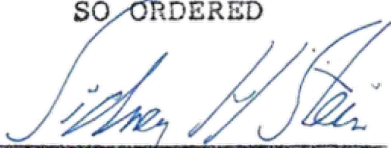
Respectfully submitted,

_____/s/_____
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cc: Jacob Fiddelman
Assistant United States Attorney
By Email

Application denied.

**Dated: New York, New York
June 10, 2020**

SO ORDERED


SIDNEY H. STEIN
U.S.D.J.